



UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

June 2022 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

OKECHUKWU NWOFOR,
aka "Junior,"
RICHARD EXUME,
KADINE AUGUSTINE,
LLOYD SCALE, and
SAMANTHA SCALE,

Defendants.

CR 2:22-cr-00300-SVW

I N D I C T M E N T

[18 U.S.C. § 1956(h): Conspiracy
to Commit Money Laundering; 18
U.S.C. § 982: Criminal Forfeiture]

The Grand Jury charges:

[18 U.S.C. § 1956(h)]

[ALL DEFENDANTS]

A. INTRODUCTORY ALLEGATIONS

1. At times relevant to this Indictment:

a. Defendant OKECHUKWU NWOFOR, also known as "Junior," lived in Brooklyn, New York, and was the sole signatory on a Santander Bank account in his own name ending in 0385 (the "0385 Account").

1 b. Defendant NWOFOR was also the sole owner and signatory
2 of Juboy New Generation, Inc. and controlled the following bank
3 accounts in the name of Juboy New Generation, Inc., among others:

4 i. A Capital One Bank account ending in 9141 (the
5 "9141 Account");

6 ii. A TD Bank account ending in 3363 (the "3363
7 Account"); and

8 iii. A Santander Bank account ending in 4958 (the
9 "4958 Account").

10 c. Defendant RICHARD EXUME lived in Brooklyn, New York,
11 and was the sole signatory and controlled the following bank accounts
12 in his own name, among others:

13 i. A Capital One Bank account ending in 9015 (the
14 "9015 Account"); and

15 ii. A Chase Bank account ending in 3033 (the "3033
16 Account").

17 d. Defendant KADINE AUGUSTINE lived in Brooklyn, New
18 York, and was the sole signatory and controlled the following bank
19 accounts in her own name, among others:

20 i. A Santander Bank account ending in 1594 (the
21 "1594 Account"); and

22 ii. A TD Bank account ending in 1059 (the "1059
23 Account").

24 e. Defendant LLOYD SCALE ("L. SCALE") lived in Brooklyn,
25 New York, and was the sole signatory and controlled a Santander Bank
26 account in his own name ending in 0594 (the "0594 Account").

1 f. Defendant SAMANTHA SCALE ("S. SCALE") lived in
2 Brooklyn, New York, and was the sole signatory and controlled a TD
3 Bank account in her own name ending in 0351 (the "0351 Account").

4 g. A "romance scam" was a fraudulent scheme in which a
5 user of an internet dating website or social media platform was
6 targeted by one or more imposters posing as a potential romantic
7 partner. Using false pretenses, representations, and promises, the
8 imposter would deceive the victim into believing that the victim and
9 the imposter had a trust relationship based on friendship and/or
10 romantic attachment, and would trick the victim into: (a) sending
11 money by interstate wire or check to, or for the benefit of, the
12 imposter, under false pretenses; and/or (b) receiving money by
13 interstate wire or check on behalf of the imposter under false
14 pretenses, and then forwarding the money, again by interstate wire or
15 check, as directed by the imposter.

16 h. A "Business Email Compromise" scam, or BEC scam, was a
17 fraudulent scheme that involved using fraudulent emails to trick
18 victim companies into making interstate wire transfers to the
19 scammers and their agents. The emails are sent from "spoofed" email
20 addresses, meaning that they fraudulently appear to be from real
21 email addresses for employees of the victim company authorized to
22 approve wire transfers, and/or for persons doing business with the
23 company who are expecting payments from the company. In fact, the
24 emails are from co-conspirators posing as employees of the victim
25 company or persons doing business with the victim company
26 ("imposters"), and their purpose is to trick employees of the victim
27 company into wiring the funds to accounts controlled by, or
28 accessible to, the imposters, after which the money may be sent to

1 additional intermediary transfer accounts owned or controlled by the
2 imposters and their agents.

3 B. THE OBJECT OF THE CONSPIRACY

4 2. Beginning on a date unknown, but no later than on or about
5 July 6, 2018, and continuing through in or about November 2019, in
6 Los Angeles County, within the Central District of California, and
7 elsewhere, defendants NWOFOR, EXUME, AUGUSTINE, L. SCALE, and S.
8 SCALE knowingly conspired with one another and others known and
9 unknown to the Grand Jury to commit an offense against the United
10 States, namely, to knowingly conduct and attempt to conduct financial
11 transactions affecting interstate and foreign commerce, which
12 transactions involved the proceeds of specified unlawful activity,
13 that is, wire fraud, in violation of Title 18, United States Code,
14 Section 1343, knowing that the transactions were designed in whole
15 and in part to conceal and disguise the nature, location, source,
16 ownership, and control of the proceeds of specified unlawful
17 activity, and, while conducting and attempting to conduct such
18 financial transactions, knowing that the property involved in the
19 financial transactions represented the proceeds of some form of
20 unlawful activity, in violation of Title 18, United States Code,
21 Section 1956(a)(1)(B)(i).

22 C. THE MANNER AND MEANS OF THE CONSPIRACY

23 3. The object of the conspiracy was to be carried out, and was
24 carried out, in substance, as follows:

25 a. Defendant NWOFOR would communicate with defendants
26 EXUME, AUGUSTINE, L. SCALE, and S. SCALE, and others regarding (1)
27 the information about bank accounts they had or could open at various
28 banks in order to receive money, (2) "jobs" or amounts that would be

1 transferred into those accounts, and (3) amounts that defendants
2 EXUME, AUGUSTINE, L. SCALE, and S. SCALE, and others could expect to
3 receive for receiving and transferring the funds as instructed
4 through their accounts.

5 b. Using that bank account information, as well as
6 information regarding bank accounts held in the name of Juboy New
7 Generation, Inc. that defendant NWOFOR controlled, defendant NWOFOR
8 would then cause the proceeds of romance scams, BEC schemes, and
9 other fraud schemes conducted by co-conspirators to be sent,
10 sometimes by the victims themselves and by means including interstate
11 wires, to accounts that defendants NWOFOR, EXUME, AUGUSTINE, L.
12 SCALE, and S. SCALE, and others, controlled, knowing and intending
13 that such deposits would conceal or disguise the nature, location,
14 source, ownership, or control of the funds.

15 c. Once the funds were received into those accounts,
16 defendants EXUME, AUGUSTINE, L. SCALE, and S. SCALE, and others,
17 acting at defendant NWOFOR's direction, would quickly transfer a
18 substantial portion of those funds, including through wires to
19 accounts defendant NWOFOR controlled or mobile payments such as
20 Zelle, make large cash withdrawals, and use a portion on personal
21 expenses. With respect to the victim funds sent to accounts
22 defendant NWOFOR controlled, or the funds transferred into accounts
23 defendant NWOFOR controlled by defendants EXUME, AUGUSTINE, L. SCALE,
24 and S. SCALE, and others, acting at defendant NWOFOR's direction,
25 defendant NWOFOR would quickly transfer a substantial portion of
26 those funds, including through wires or mobile payments such as
27 Zelle, to other co-conspirators, make large cash withdrawals, and use
28 a portion on personal expenses.

1 4. In total, defendants NWOFOR, EXUME, AUGUSTINE, L. SCALE,
2 and S. SCALE laundered at least approximately \$530,000 in funds
3 provided by the victims of these romance scams and BEC schemes.

4 D. OVERT ACTS

5 5. In furtherance of the conspiracy, and to accomplish its
6 object, defendants NWOFOR, EXUME, AUGUSTINE, L. SCALE, and S. SCALE,
7 together with others known and unknown to the Grand Jury, on or about
8 the following dates, committed and willfully caused others to commit
9 the following overt acts, among others, within the Central District
10 of California and elsewhere:

11 Overt Act No. 1: On or about September 26, 2018, defendant
12 NWOFOR and his co-conspirators caused romance scam victim, E.H., to
13 wire \$19,000 from her bank account in California, to defendant
14 AUGUSTINE's 1594 Account in New York.

15 Overt Act No. 2: On or about September 26, 2018, defendant
16 AUGUSTINE wired \$5,000, traceable at least in part to victim E.H.'s
17 funds, from defendant AUGUSTINE's 1594 Account to defendant NWOFOR's
18 0385 Account.

19 Overt Act No. 3: On or about September 27, 2018, defendant
20 AUGUSTINE wired \$5,000, traceable at least in part to victim E.H.'s
21 funds, from defendant AUGUSTINE's 1594 Account to defendant NWOFOR's
22 0385 Account.

23 Overt Act No. 4: On or about September 28, 2018, defendant
24 AUGUSTINE wired \$5,000, traceable at least in part to victim E.H.'s
25 funds, from defendant AUGUSTINE's 1594 Account to defendant NWOFOR's
26 0385 Account.

27 Overt Act No. 5: On or about October 1, 2018, defendant
28 AUGUSTINE wired \$1,140, traceable at least in part to victim E.H.'s

1 funds, from defendant AUGUSTINE's 1594 Account to defendant NWOFOR's
2 0385 Account.

3 Overt Act No. 6: On or about July 9, 2018, defendant NWOFOR
4 and his co-conspirators caused romance scam victim, J.B., to wire
5 \$25,000 from J.B.'s bank in Ohio to the 9141 Account defendant NWOFOR
6 controlled in New York.

7 Overt Act No. 7: On or about July 13, 2018, defendant NWOFOR
8 and his co-conspirators caused victim J.B. to wire \$120,000 from
9 J.B.'s bank in Ohio to the 9141 Account defendant NWOFOR controlled
10 in New York.

11 Overt Act No. 8: On or about August 17, 2018, defendant
12 NWOFOR and his co-conspirators caused victim J.B. to wire \$25,000
13 from J.B.'s bank in Ohio to defendant L. SCALE's 0594 Account in New
14 York.

15 Overt Act No. 9: On or about August 20, 2018, defendant L.
16 SCALE wired \$5,000, traceable at least in part to victim J.B.'s
17 funds, from defendant L. SCALE's 0594 Account to defendant NWOFOR's
18 0385 Account.

19 Overt Act No. 10: On or about August 21, 2018, defendant L.
20 SCALE wired \$5,000, traceable at least in part to victim J.B.'s
21 funds, from defendant L. SCALE's 0594 Account to defendant NWOFOR's
22 0385 Account.

23 Overt Act No. 11: On or about August 20, 2018, defendant
24 NWOFOR and his co-conspirators caused victim J.B. to wire \$28,000
25 from J.B.'s bank in Ohio to defendant AUGUSTINE's 1059 Account in New
26 York.

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1 Overt Act No. 12: On or about August 21, 2018, defendant
2 AUGUSTINE withdrew \$8,000 in cash traceable at least in part to
3 victim J.B.'s funds from the 1059 Account.

4 Overt Act No. 13: On or about August 29, 2018, defendant
5 AUGUSTINE withdrew \$7,500 in cash traceable at least in part to
6 victim J.B.'s funds from the 1059 Account.

7 Overt Act No. 14: On or about September 5, 2018, defendant
8 AUGUSTINE withdrew \$3,200 in cash traceable at least in part to
9 victim J.B.'s funds from the 1059 Account.

10 Overt Act No. 15: On or about July 9, 2018, defendant NWOFOR
11 and his co-conspirators caused a cashier's check for \$60,000 payable
12 to Juboy New Generation, Inc. and purchased by romance scam victim
13 L.B. to be deposited into the 3363 Account defendant NWOFOR
14 controlled.

15 Overt Act No. 16: On or about July 10, 2018, defendant NWOFOR
16 and his co-conspirators caused a cashier's check for \$70,000 payable
17 to Juboy New Generation, Inc. and purchased by L.B. to be deposited
18 into the 3363 Account defendant NWOFOR controlled.

19 Overt Act No. 17: On or about July 11, 2018, defendant NWOFOR
20 and his co-conspirators caused a cashier's check for \$22,000 payable
21 to defendant S. SCALE and purchased by L.B. to be deposited into
22 defendant S. SCALE's 0351 Account.

23 Overt Act No. 18: On or about August 13, 2018, defendant
24 NWOFOR and his co-conspirators caused \$100,000 traceable at least in
25 part to BEC victim W.W.'s funds to be wired from a JPMorgan Chase
26 bank account ending in 6223 (the "6223 Account") to defendant EXUME's
27 9015 Account.

1 Overt Act No. 19: On or about August 13, 2018, defendant
2 NWOFOR and his co-conspirators caused \$50,000 traceable at least in
3 part to BEC victim W.W.'s funds to be wired from the 6223 Account to
4 an account controlled by a co-conspirator.

5 Overt Act No. 20: On or about August 15, 2018, defendant
6 NWOFOR and his co-conspirators caused a cashier's check for \$38,000
7 payable to Juboy New Generation, Inc., and traceable at least in part
8 to BEC victim W.W.'s funds, to be purchased by the co-conspirator
9 described in Overt Act 19.

10 Overt Act No. 21: On or about August 16, 2018, defendant
11 NWOFOR deposited the funds described in Overt Act 20 into the 4958
12 Account defendant NWOFOR controlled.

13 Overt Act No. 22: On or about August 14, 2019, defendant
14 NWOFOR and his co-conspirators caused \$13,923.50 in fraudulent funds
15 traceable at least in part to a BEC victim's funds, to be wired to
16 defendant EXUME's 3033 Account.

17 Overt Act No. 23: On or about August 14, 2019, defendant EXUME
18 transferred \$1,000, traceable at least in part to the \$13,923.50 in
19 BEC victim funds described in Overt Act 22, from defendant EXUME's
20 3033 Account to defendant NWOFOR via a bank transfer using the Zelle
21 electronic payment application.

22 Overt Act No. 24: On or about August 14, 2019, defendant EXUME
23 transferred \$500, traceable at least in part to the \$13,923.50 in BEC
24 victim funds described in Overt Act 22, from his 3033 Account to
25 defendant S. SCALE via a bank transfer using an electronic Cash App
26 payment system.

1 FORFEITURE ALLEGATION

2 [18 U.S.C. § 982]

3 1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal
4 Procedure, notice is hereby given that the United States will seek
5 forfeiture as part of any sentence, pursuant to Title 18, United
6 States Code, Section 982(a)(1), in the event of any defendant's
7 conviction of the offense set forth in this Indictment.

8 2. Any defendant so convicted shall forfeit to the United
9 States of America the following:

10 (a) Any property, real or personal, involved in such
11 offense, and any property traceable to such property including,
12 without limitation, the following property seized on or about May 20,
13 2019: approximately \$100,000 in bank funds seized from Capital One
14 Bank account ending in 9015 held in the name of defendant RICHARD
15 EXUME; and

16 (b) To the extent such property is not available for
17 forfeiture, a sum of money equal to the total value of the property
18 described in subparagraph (a).

19 3. Pursuant to Title 21, United States Code, Section 853(p), as
20 incorporated by Title 18, United States Code, Section 982(b)(1), and
21 Title 18, United States Code, Section 982(b)(2), any defendant so
22 convicted shall forfeit substitute property, if, by any act or
23 omission of said defendant, the property described in the preceding
24 paragraph, or any portion thereof: (a) cannot be located upon the
25 exercise of due diligence; (b) has been transferred, sold to, or
26 deposited with a third party; (c) has been placed beyond the
27 jurisdiction of the court; (d) has been substantially diminished in
28 value; or (e) has been commingled with other property that cannot be

1 divided without difficulty. Substitution of assets shall not be
2 ordered, however, where the convicted defendant acted merely as an
3 intermediary who handled but did not retain the property in the
4 course of the money laundering offense unless the defendant, in
5 committing the offense or offenses giving rise to the forfeiture,
6 conducted three or more separate transactions involving a total of
7 \$100,000.00 or more in any twelve-month period.

8 A TRUE BILL

9
10 /S/
11 Foreperson

12 STEPHANIE S. CHRISTENSEN
13 Acting United States Attorney



14
15 SCOTT M. GARRINGER
16 Assistant United States Attorney
Chief, Criminal Division

17 RANEE KATZENSTEIN
18 Assistant United States Attorney
Chief, Major Frauds Section

19 SCOTT PAETTY
20 Assistant United States Attorney
Deputy Chief, Major Frauds Section

21 ALI MOGHADDAS
22 Assistant United States Attorney
Major Frauds Section

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